

Comments  
9/16/05 K-d  
Comments  
10/19/05 K-d

MSA-S-1829-5280

SO 587-05	Lilly, Thomas
VAR	05-810

12/8/10 File  
originally cleaned.  
DS

Robert L. Ehrlich, Jr.  
Governor



Michael S. Steele  
Lt. Governor

Martin G. Madden  
Chairman

Ren Serey  
Executive Director

**STATE OF MARYLAND  
CRITICAL AREA COMMISSION  
CHESAPEAKE AND ATLANTIC COASTAL BAYS**

1804 West Street, Suite 100, Annapolis, Maryland 21401  
(410) 260-3460 Fax: (410) 974-5338  
[www.dnr.state.md.us/criticalarea/](http://www.dnr.state.md.us/criticalarea/)

October 19, 2005

Mr. Tom Lawton  
Department of Technical and Community Services  
11916 Somerset Ave, Room 102  
Princess Anne, MD 21853

Re: Variance 05-810 Lilly-Revised

Dear Mr. Lawton:

Thank you for providing information on the above referenced revised variance. The applicant is requesting a variance from the 100-foot Buffer in order to construct a primary dwelling. The property is located within a designated Resource Conservation Area (RCA) and is currently undeveloped.


Based on the revised information received and an October 18, 2005 conversation with Mr. Thomas Lilly, the applicant is proposing to construct a 3,000 square foot dwelling, and an additional 450 square feet of sidewalks and porches, for a total impervious footprint of 3,530 square feet. It is my understanding that the 1,500 square foot driveway is to be constructed of a pervious sand material. The upland area on the property is approximately 2.4 acres, and the entire development proposal is located within the 100-foot Buffer. In evaluating the variance request, the Board must determine whether the applicant has met each of the County's variance standards, including the standard of unwarranted hardship, and the standard that the proposal is the minimum necessary to make reasonable use of the lot or parcel. While we recognize that the development of this parcel is not feasible without some degree of variance, it appears that a smaller impervious footprint could be achieved which still provides reasonable living space to the applicant, particularly if vertical construction is utilized. As the closest point of the building envelope to tidal wetlands is 26 feet, we recommend that the Board consider whether further minimization is possible, and whether adequate assurance has been provided that the proposed development will not negatively impact fish and wildlife habitat, nor further impair water quality. In addition, we provide the following comments for consideration by the Board.

- 1) The Department of Natural Resources (DNR) has identified the parcel as lying within the tertiary protection zone for a nearby Bald Eagle nest. As such, any construction must be completed outside of the December 15 through June 15 time of year restriction. We recommend that this restriction be added as a condition of any variance approval.

- 2) DNR has also identified the parcel as containing Forest Interior Dwelling Bird (FIDS) habitat. Protection of these species is mandated within the Critical Area. Protection guidelines for FIDS can be found within the Commission's guidance paper, A Guide to the Conservation of FIDS in the Chesapeake Bay Critical Area. In addition, please note that all construction activity must be completed outside of the April through August time of year restriction for FIDS. We recommend that this be made a condition of any variance approval.
- 3) Given the proximity of the proposed development to tidal wetlands, we recommend that the use of super silt fencing be required surrounding the limits of disturbance, including the area identified as the location of the sewage disposal area. We recommend that this requirement be included as a condition of any variance approval.
- 4) As the applicant has indicated the intent to retain a pervious sand driveway area, we recommend that this be included as a condition of any variance approval.
- 5) To aid in further reduction of impervious footprint, we recommend that the Board require the proposed decks and/or porches to be constructed in a pervious manner, with spacing between the boards, six inches of gravel substrate below the decks, and native plantings surrounding the base of the decks.
- 6) We note that mitigation for impacts to the 100-foot Buffer will be required at the time of development. This mitigation should be provided at a 2:1 ratio, measured by the areal extent of Buffer disturbance.

Thank you for the opportunity to provide comments. Please include this letter in your file and submit it as part of the record for this variance. Also, please notify the Commission in writing of the decision made in this case.

Sincerely,



Kerrie L. Gallo  
Natural Resource Planner  
SO587-05

Robert L. Ehrlich, Jr.  
*Governor*

Michael S. Steele  
*Lt. Governor*



Martin G. Madden  
*Chairman*

Ren Serey  
*Executive Director*

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September 16, 2005

Mr. Tom Lawton  
Department of Technical and Community Services  
11916 Somerset Ave, Room 102  
Princess Anne, MD 21853

Re: Variance 05-810 Lilly

Dear Mr. Lawton:

Thank you for providing information on the above referenced variance. The applicant is requesting a variance from the 100-foot Buffer in order to construct a primary dwelling. The property is located within a designated Resource Conservation Area (RCA) and is currently undeveloped.

Based on the information provided, we have the following comments:

- 1) Information taken from the State of Maryland's online mapping system, MERLIN, indicates that portions of Parcel 20 may contain non-tidal wetlands in addition to the tidal areas shown. As shown on the maps included, the non-tidal wetland areas appear to overlap the location where a driveway is proposed, as well as possibly overlap the proposed building envelope itself. Where impacts to non-tidal wetlands are proposed, the applicant will be required to obtain a permit from the Maryland Department of the Environment (MDE). We recommend that a field delineation, conducted by a qualified professional, be required in order to evaluate the extent of non-tidal wetlands on the property prior to any variance approval. This will ensure that the extent of environmental features are clearly marked and identified prior to future development activities on the site.
- 2) MERLIN also indicates that Parcel 20 lies within a designated Sensitive Species Review Area. Prior to any development activities on the parcel, the applicant will be required to obtain additional information from the Department of Natural Resource's (DNR) Wildlife and Heritage Division regarding the specific species of concern. Upon obtaining this information, any recommendations made by DNR for the protection of the species identified will have to be addressed by the applicant via the submission of a Habitat Protection Plan.
- 3) The information submitted in the site plan states that approximately 3.5 acres of upland exists on Parcel 20. Measurements taken from MERLIN indicate that the upland areas may be significantly less. While we note that these measurements, as shown in the included maps,

are not intended to represent exact figures, it does appear that the actual area of upland on Parcel 20 may be significantly less than the area indicated by the applicant. This is important as the buildable area maybe significantly decreased, affecting the ability to site a sewage disposal area or well on the property. In addition, the total amount of permitted impervious surface area may be affected. Given this discrepancy in information, we recommend that a field delineation of tidal and non-tidal wetland areas be performed prior to the approval of a variance.

In addition to the comments above, we note that the applicant is proposing to construct a dwelling with a 3,750 square foot footprint, along with various impervious accessory elements. The closest point of the proposed development is 26 feet from tidal wetlands. The total impervious footprint proposed is 4,955 square feet. While we recognize that development of this property would not be feasible outside of the Buffer, and that some degree of variance will be required to develop the property, the Somerset County Zoning Ordinance and variance standards require that the variance be the minimum necessary to make reasonable use of the land, buildings, and structures. In addition, the County's variance standards also include the burden to prove that the granting of a variance will not impact water quality or adversely impact fish, wildlife, or plant habitat within the jurisdiction's Critical Area. Based on the environmental features of Parcel 20, it is the opinion of this office that the dwelling proposed is excessive, particularly in consideration of its location within and impact to the Buffer. It appears that a smaller dwelling and building envelope could be constructed which provides reasonable living space to the applicant, while also providing assurance that negative impacts to water quality will be minimized.

Because we believe that the applicant has not met each of the County's variance standards, and given the lack of knowledge surrounding the extent of tidal and non-tidal wetlands, habitat protection areas and general buildable areas, we cannot offer support to this variance request as proposed. We recommend that the applicant submit a revised variance request which addresses the environmental concerns associated with the site plan and general lack of information, and which demonstrates minimization of impact to the Critical Area.

Thank you for the opportunity to provide comments. Please include this letter in your file and submit it as part of the record for this variance. Also, please notify the Commission in writing of the decision made in this case.

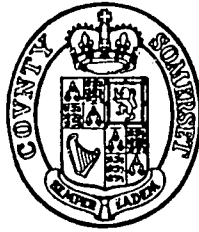
Sincerely,



Kerrie L. Gallo  
Natural Resource Planner  
SO587-05

Enclosures

SOMERSET COUNTY  
DEPARTMENT OF TECHNICAL AND COMMUNITY SERVICES



Planning & Technical Services Division

**SOMERSET COUNTY BOARD OF ZONING APPEALS  
PRINCESS ANNE, MARYLAND**

**APPLICATION NO. CBCA VAR 05-810**

**RE: Thomas Lilly**

Upon the Application for Critical Area Variance to the property described therein located in the Mount Vernon Election District on Tax Map #3, Block #17, Parcel #132, Lot 20 in the Daniel White Farm subdivision, and after consideration of the said Application and the testimony and other evidence presented to the Board at the hearing held on Friday, October 21, 2005, the Board of Zoning Appeals hereby finds:

(1) That the requirements of Section 9.3 b. (9) of the Zoning Ordinance have been met by the Applicant, that special circumstances and conditions exist which are peculiar to the property involved and which are not applicable to other properties in the same zone.

(2) That Mr. Thomas Lilly, the fee simple owner of the property, has applied for a Variance and a Critical Area Variance. The Applicant proposes a fifty-three (53) foot zoning setback to the center of the road for a twelve (12) foot Variance and a minimum front yard of thirty-three (33) feet for a seven (7) foot Variance. The Critical Area Variance is requested for a future homesite, consisting of approximately forty-nine hundred eighty (4980) square feet of impervious surface.

(3) That a literal interpretation of the provisions of the Ordinance would deprive the Owner of his rights commonly enjoyed by other properties in the same zone under terms of this Ordinance.

(4) That the special conditions and circumstances referred to above do not result from actions of the Applicant.

(5) That there appeared no adjoining property owners either in person or by letter before the Board to express opposition to the Application for Variance.

(6) That the granting of this Variance will not confer Applicant any special privileges that are denied by the Zoning Ordinance to other properties in the same zone.

(7) That the Variance granted herein is the minimum Variance that will make possible the reasonable use of the property and is in harmony with the general purpose and intent of the Zoning Ordinance and will not be injurious to the neighborhood or detrimental to the public welfare.

(8) The Board found the following facts in this particular matter:

(a) The Applicant requested the Variance from the 100 foot Buffer to accommodate a house, sidewalk, driveway, and septic reserve area on the property.

(b) The property, which is over ten acres in size, is predominately tidal and non-tidal wetlands with very limited upland area.

(c) The Applicant has had a wetlands delineation completed, approval of the septic reserve area by Environmental Health, and calculated the impervious surface, agreeing to a pervious driveway and making the footprint within the development envelope of 3,000 square feet of impervious surface.

(d) A letter from the Critical Area Commission (Exhibit #1), dated October 19, 2005, provided the following recommendations and comments for the Board's consideration:

(1) The Department of Natural Resources (DNR) has identified the parcel as lying within the tertiary protection zone for a nearby Bald Eagle nest. Any construction must be completed outside of the December 15th through June 15th time of the year restriction.

(2) DNR also identified the parcel as containing Forest Interior Dwelling Bird (FIDS) habitat. Protection of these species is mandated within the Critical Area; therefore, all construction activity must be completed outside of the April through August time of year restriction for FIDS.

(3) The Commission recommends the use of super silt fencing surrounding the limits of the disturbance due to the proximity of the proposed development to the tidal wet-lands, including the area identified as the location of the sewage disposal area.

(4) The Commission agreed with the Applicant's intent to retain a pervious sand driveway area.

(5) The proposed decks and/or porches should be constructed in a pervious manner, with spacing between the boards, six inches of gravel substrate below the decks, and native plantings surrounding the base of the decks.

(6) At the time of development, mitigation at a 2:1 ratio should be completed for impacts to the 100 foot Buffer.



(e) The Applicant presented a packet (Exhibit #2) consisting of scaled drawings/plats/map, letter from the Maryland Department of Natural Resources, and his letter to DTCS for the Board's consideration.

(f) The Board found from the Applicant's presentation that the lot would not be buildable as proposed without the variance being granted and, therefore would create an extreme hardship upon the Applicant.

Upon the foregoing, the Critical Area Variance is granted with the following conditions and safeguards:

(1) Be advised that no construction shall take place from December 15th through July 30th due to the nearby Bald Eagle nesting noted by the Department of Natural Resources and according to restrictions for Forest Interior Dwelling Bird (FIDS) habitat.

(2) Be advised that super silt fencing shall be used surrounding the limits of disturbance, including the area identified as the location of the sewage disposal area.

(3) Be advised that the Applicant shall retain a pervious sand driveway area.

(4) Be advised that the proposed decks and/or porches shall be constructed in a pervious manner with spacing between the boards, six inches of gravel substrate below the decks, and native plantings surrounding the base of the decks.

(5) Be advised that mitigation at the time of development shall be provided at a 2:1 ratio, measured by the areal extent of Buffer disturbance.

**This decision is only zoning approval. It is the Applicant's responsibility to submit all necessary information or documents (i.e. elevation certificate, plumbing information, etc.) to the Department of Technical & Community Services to obtain a Zoning Certificate.**

For these reasons, and subject to the above conditions, if any, the Application for Critical Area Variance is granted. **REQUEST FOR ZONING VARIANCE WILL BE HEARD AT NOVEMBER 18th MEETING OF THE BOARD.**

By order of the Board of Zoning Appeals this 4<sup>th</sup> day of November, 2005.

Robert Hess / sh  
Robert Hess, Chairman  
Board of Zoning Appeals

**YOU HAVE THE RIGHT TO APPEAL THIS DECISION TO THE CIRCUIT COURT OF MARYLAND WITHIN THIRTY (30) DAYS FROM THE DATE OF THIS DECISION.**

P.O. BOX 541493  
MERRITT ISLAND, FLORIDA 32954

NOVEMBER 28, 2005

MS. KERRIE GALLO  
CRITICAL AREA COMMISSION  
1804 WEST STREET, SUITE 100  
ANNAPOLIS, MD. 21401

DEAR MS. GALLO:

PLEASE FIND ENCLOSED INFORMATION TO HELP YOU LOCATE THE PROPERTY IN QUESTION RELATED TO THE INFORMATION RECEIVED CONCERNING YET ANOTHER SCHEME BY MR. LILLY TO OBTAIN WATERFRONT ACCESS TO THE WICOMICO RIVER IN ORDER TO PROVIDE PRIVATE ACCESS, IN THE FORM OF A COMMUNITY TYPE MARINA, TO PURCHASERS OF HIS EXTENSIVE NON-WATERFRONT SUBDIVISION LOTS. THIS TYPE OF ACTIVITY, WHICH COULD NUMBER ANYWHERE FROM 20 TO 100, OR MORE, HOME SITES, SINCE THE TRUE EXTENT OF HIS HOLDINGS ARE UNKNOWN TO ME, IS ESSENTIALLY AKIN TO A PUBLIC, COMMERCIAL MARINA IN TERMS OF THE IMPACT UPON THE ENVIRONMENT AND SURROUNDING PROPERTY AND IT IS CERTAINLY NOT IN KEEPING WITH THE PRESENT ZONING OF SINGLE FAMILY RESIDENCES PERMITTED AT THIS LOCATION.

THE CONCERNS ARE NOT ONLY FOR THE ENVIRONMENTAL IMPACT, BUT ALSO FOR THE "NUISANCE" (PUBLIC OR PRIVATE) THAT IS SURE TO BE CREATED BY THE COMING AND GOING OF NUMEROUS STRANGERS ADJACENT TO THE QUINN PROPERTY. THE ATTENDANT DISRUPTION TO THE LIVES OF ADJACENT PRIVATE RESIDENTS FROM THE OPERATION OF SUCH A FACILITY, IF PAST EXPERIENCE IS A GUIDE, WILL INCLUDE 24 HOUR VEHICULAR TRAFFIC, BRIGHT LIGHTS AT ALL TIMES OF THE NIGHT, LOUD MUSIC, PARTYING, DRINKING, YELLING, FIGHTING, URINATING IN PUBLIC, AND THE INEVITABLE TRESPASSING OF THESE STRANGERS ON THE QUINN PROPERTY TO USE THE FACILITIES INCLUDING BATHROOMS, WATER, TELEPHONE AND ELECTRICITY. OBVIOUSLY ANY LEGAL RIGHTS TO ENJOY A QUIET LIFE ON PRIVATE PROPERTY, WITHOUT PROBLEMS, WILL BE NEGATED.

THE IDEA THAT SOME SORT OF STRUCTURAL ACCESS, RAISED OR NOT, ON THIS RIGHT OF WAY TO THE RIVER, WOULD SEEM, BY DEFINITION, TO VIOLATE THE LAWS RESTRICTING THE CONSTRUCTION OF ANYTHING ON A RIGHT OF WAY, BE IT MR. LILLY'S OR THE QUINN'S. (NOTE: I WAS EVEN DENIED PERMISSION TO CANTILEVER MY DECK JUST 3' CLOSER TO THE RIVER BY OFFICIALS AT SOMERSET COUNTY PLANNING AND ZONING, EVEN THOUGH IT WAS OVER FAST LAND AND DID NOT TOUCH OR DISTURB ANYTHING ON THE GROUND.) WE HAVE BEEN ADVISED THAT MR. LILLY, AT LEAST IN CONCEPT AND, BY EXTENSION ANTICIPATING A PROPOSAL OF SOME SORT FOR THIS RIGHT OF WAY, HAS RECENTLY BEEN ADDING FILL DIRT TO THE RIGHT OF WAY NEAR THE RIVER. THIS WOULD LEND CREDENCE TO THE INFORMATION.

WHEN MR. LILLY RUSHED TO SUBDIVIDE HIS LAND HOLDINGS PRIOR TO THE IMPLEMENTATION OF THE WETLANDS LAWS, HE SET ASIDE A 40' X 150" SLIVER OF LAND, WHICH WAS, AT THAT TIME, CONSIDERED TO BE WETLANDS AND THEREFORE UNTOUCHABLE FOR DEVELOPMENT OF ANY KIND, AS HE PROCEEDED TO SELL, OR OFFER FOR SALE, OTHER LOTS WHICH HE CREATED AND WHICH WERE "GRANDFATHERED IN" AS LEGAL BUILDING SITES. THESE, I BELIEVE, WOULD NOT HAVE BEEN LEGAL UNDER THE NEW RESTRICTIONS. ONE CAN ONLY CONJECTURE WHAT REASON EXISTED FOR THIS UNUSUAL CONFIGURATION, BUT, THE FACT THAT HE IS A LAWYER, WITH CONNECTIONS IN PRINCESS ANNE AND ANNAPOLIS, LEADS ONE TO POSTULATE THAT THERE WAS ONE. IT IS NOT A QUANTUM LEAP TO ASSUME

RECEIVED

DEC 1 2005

CRITICAL AREA COMMISSION

THAT IT HAD TO DO WITH PROVIDING WATERFRONT ACCESS TO PURCHASERS OF HIS NON-WATERFRONT HOLDINGS.

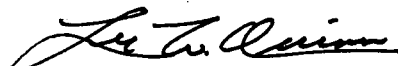
IT IS BELIEVED THAT ANY SUCH PROPOSAL IS NOT ALLOWED UNDER THE VARIOUS LAWS, RULES AND REGULATIONS GOVERNING THE USE OF PROPERTY, BE THEY RIGHT OF WAY, SINGLE FAMILY ZONING OR WETLANDS PROTECTION. THAT ANY SUCH PROPOSAL, CONTRARY TO EXISTING LAWS AND REGULATIONS, SHOULD SUMMARILY BE REJECTED GOES WITHOUT SAYING. HOWEVER, IT HAS BEEN MY PERCEPTION THAT MR. LILLY, PROBABLY BECAUSE OF HIS LEGAL EXPERTISE AND CONNECTIONS TO THE VARIOUS GOVERNMENTAL BODIES, HAS BEEN AFFORDED NUMEROUS VARIANCES AND SPECIAL CONSIDERATION THAT ORDINARY CITIZENS, INCLUDING ME, DID NOT AND WOULD NOT, NORMALLY RECEIVE.

WHAT TRANSPIRES BETWEEN MR. LILLY AND THOSE CHARGED WITH PROTECTING THE WETLANDS AND ADMINISTERING VARIOUS LAWS IS NOT FOR ME TO QUESTION, UNTIL IT ENCROACHES UPON THE QUINN PROPERTY RIGHTS, WHICH, IN THIS CASE, IT OBVIOUSLY WOULD. I AM WRITING TO APPRISE YOU OF THE SITUATION THAT EXISTS AND TO REQUEST THAT, SHOULD "ANY" OF THE INFORMATION PROVE TO BE ACCURATE AND MR. LILLY SUBMITS "ANY" TYPE OF PROPOSAL TO ALTER THE NATURE AND USE OF THE PROPERTY IN QUESTION, E.G. THE RIGHT OF WAY AND THE SLIVER OF WETLANDS, THAT WE, MY SON AND I, BE NOTIFIED IMMEDIATELY SO THAT WE MAY SUBMIT OUR CONCERNS, IN A TIMELY MANNER, TO WHATEVER LEGAL ENTITIES ARE INVOLVED IN REVIEWING SUCH A PROPOSAL, INCLUDING SOMERSET COUNTY, THE STATE OF MARYLAND (PROBABLY THROUGH YOUR OFFICE) AND THE FEDERAL GOVERNMENT (PROBABLY THROUGH THE ARMY CORPS OF ENGINEERS).

IF YOU HAVE ANY FURTHER QUESTIONS OR REQUIRE ADDITIONAL INFORMATION, PLEASE CONTACT ME AND I WILL DO ALL THAT I CAN TO PROVIDE IT. UNFORTUNATELY, I UNDERSTAND THAT SOMERSET COUNTY RECORDS AND PROCEEDINGS ARE NOT AVAILABLE TO THE PUBLIC ON LINE, AS IS CUSTOMARY IN OTHER JURISDICTIONS, SO I MUST ASK YOUR INDULGENCE AS I SEARCH OLD RECORDS AND CORRESPONDENCE, IN ADDITION TO MY MEMORY, FOR ADDITIONAL PERSPECTIVES, IF NEEDED.

I THANK YOU FOR YOUR ASSISTANCE IN HELPING US TO BRING THE SITUATION AND ITS POTENTIAL PROBLEMS TO YOUR ATTENTION AND WILL APPRECIATE ANY FUTURE DIRECTION AND ASSISTANCE YOU CAN PROVIDE.

SINCERELY,



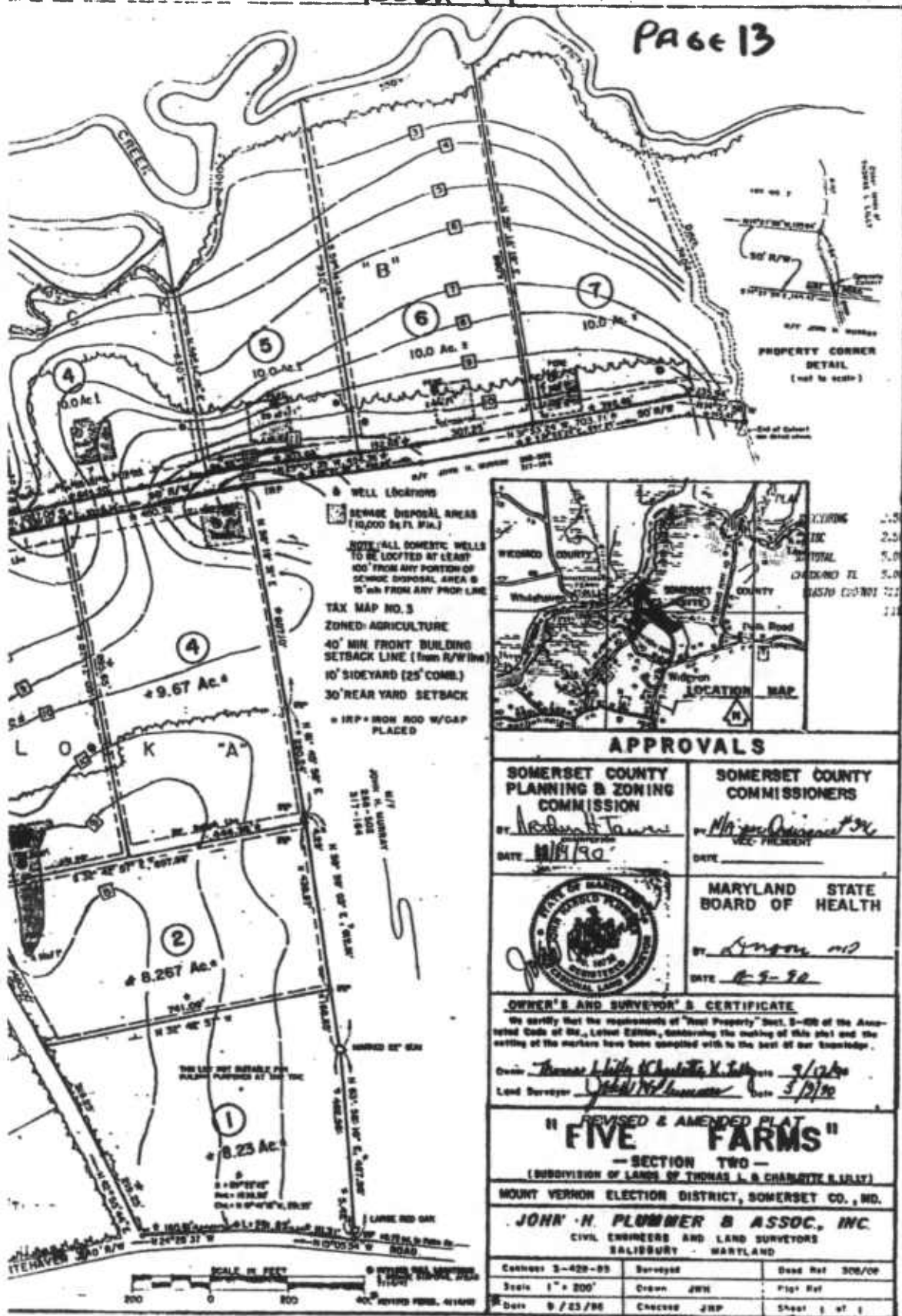
LEE W. QUINN

# INFO. TO LOCATE PROPERTY

MR. KERRIS GALLO, CRITICAL AREA COMMISSION (FOR THE 'CHEAPENKI' & ATL. COASTAL BAY)  
1804 WEST ST. SUITE 100, ANNAPOLIS, MD. 21408

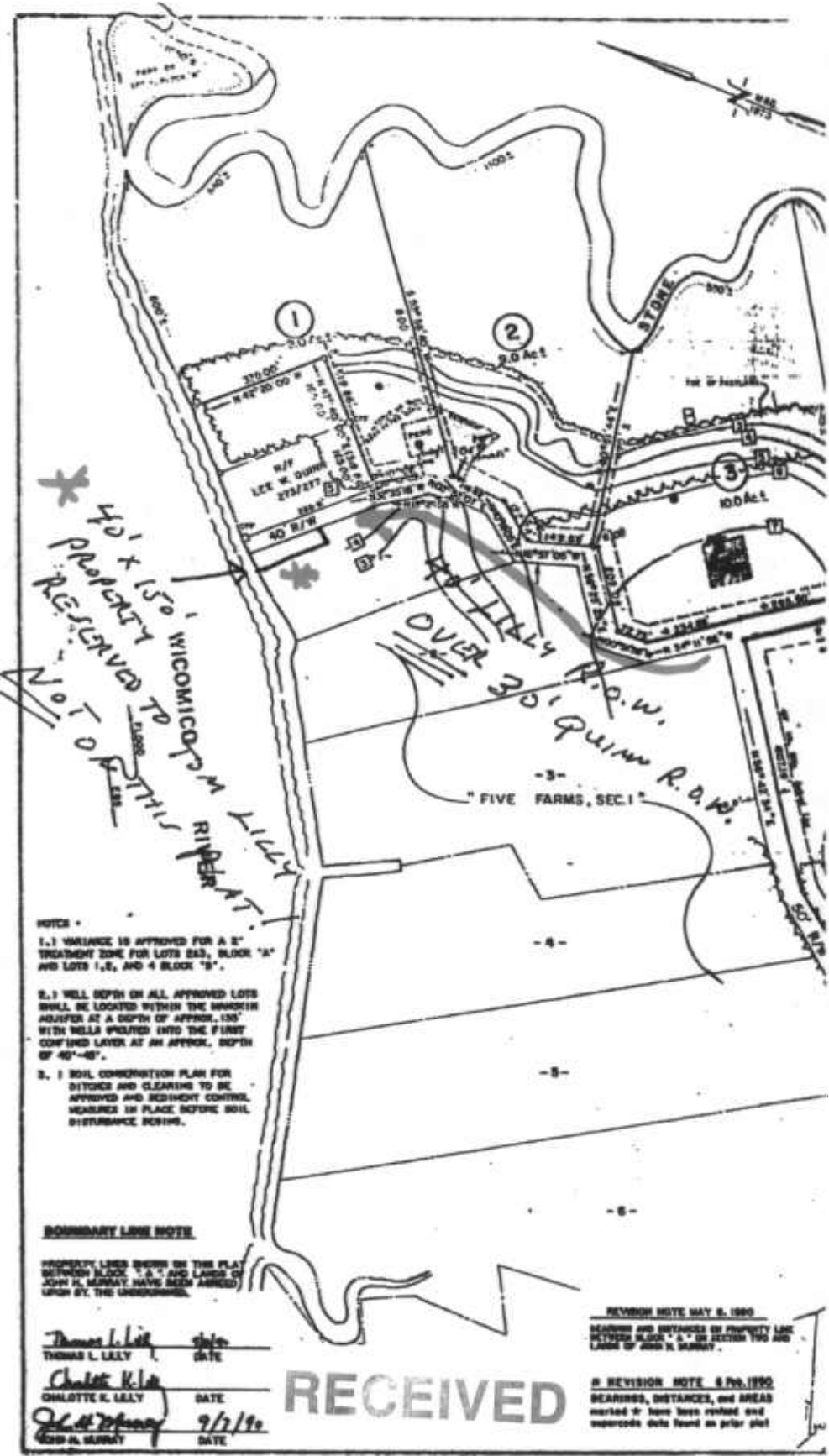
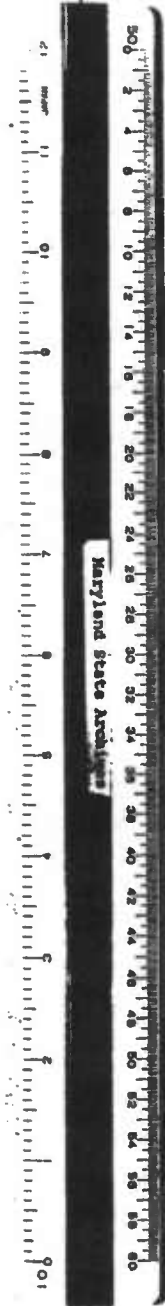
Book 17

PAGE 13



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MSA CS4 2420-837 6-40



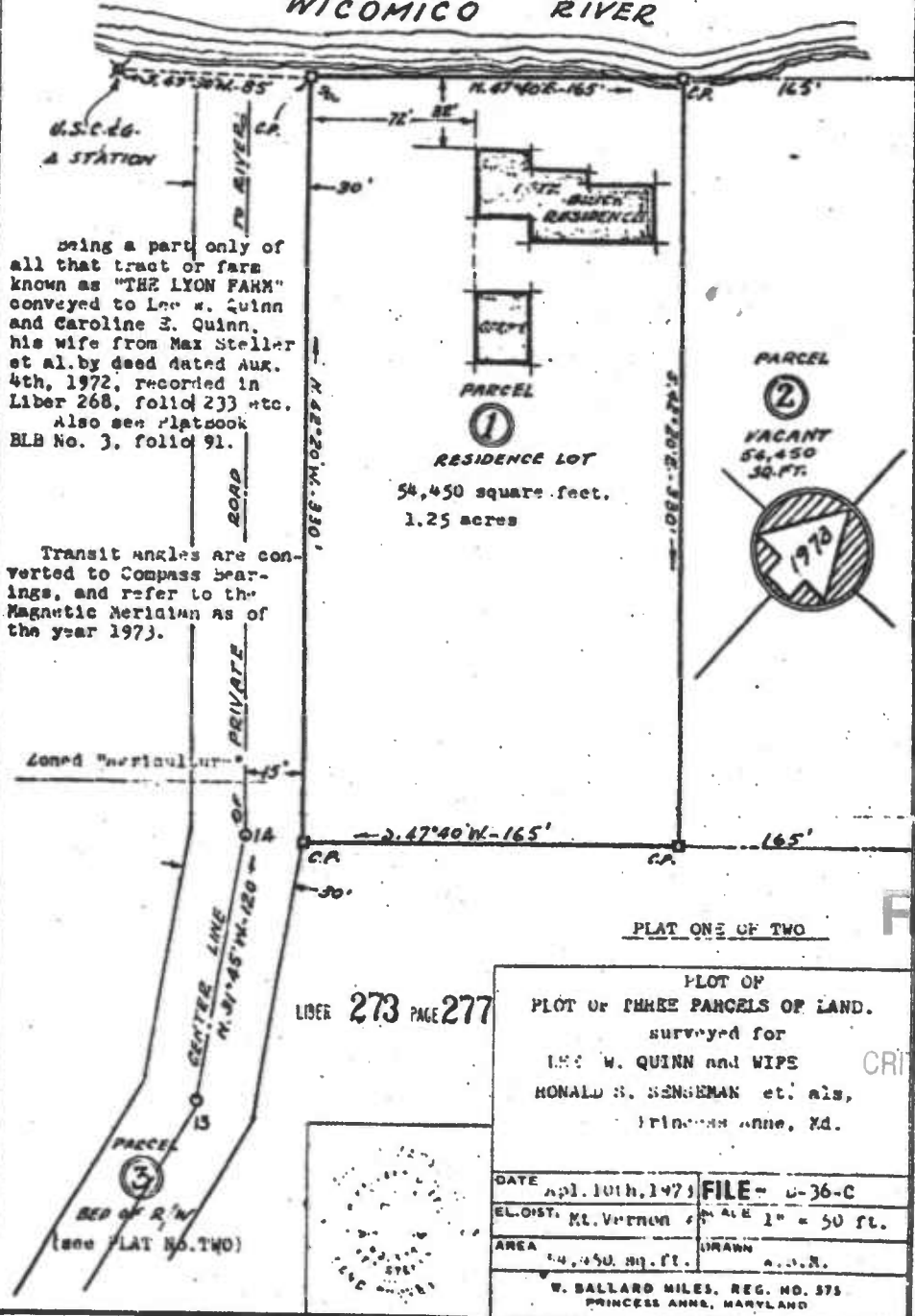
DEC. 1 2005

CRITICAL AREA COMMISSION

30' QUINN R.O.W.  
RESERVED WHEN REST OF  
FARM WAS SOLD.  
WICOMICO RIVER

Being a part only of  
all that tract or farm  
known as "THE LYON FARM"  
conveyed to LEO W. QUINN  
and CAROLINE E. QUINN,  
his wife from MAX STELLER  
et al. by deed dated AUG.  
4th, 1972, recorded in  
Liber 268, folio 233 etc.  
Also see platbook  
BLB No. 3, folio 91.

Transit angles are con-  
verted to Compass bear-  
ings, and refer to the  
Magnetic Meridian as of  
the year 1973.



PLAT ONE OF TWO

LIBER 273 PAGE 277

PLOT OF  
PLOT OF THREE PARCELS OF LAND.  
surveyed for  
LEO W. QUINN and WIFE  
RONALD S. SENSEMAN et. als,  
Princess Anne, Md.

DATE	Apr. 10th, 1973	FILE	C-36-C
EL. DIST.	KL. VERNON	SCALE	1" = 50 ft.
AREA	54,450 sq. ft.	DRAWN	A.S.M.
W. BALLARD MILES, REG. NO. 575 PRINCESS ANNE, MARYLAND			

RECEIVED

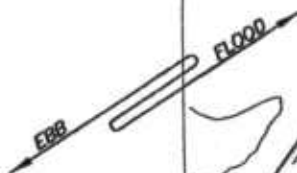
DEC 1 2005

CRITICAL AREA COMMISSION





WICOMICO  
RIVER



AREA OF LOT 20 =  
10.8± ACRES

STONE  
\*  
CREEK

19

576'±  
S 65°45'55" E  
1146'±

22

23

21

24

25

PERC HOLE

IRCP

IRCP

S 39°59'18" E  
122.04'

S 61°41'28" E  
806.49'

IRCP

IRCP

S 40°01'46" W  
176.10'

27

26

STONE  
FOUND

\* ERROR. -  
STONE CREEK IS  
1/4 MI + WEST -  
THIS IS AN UN-  
NAMED CREEK.



IRCP IRON ROD/CAP PLACED

ALL OFFSET DISTANCES ARE (± 0.20)

SURVEY NO. 2041-2004-07

TAX MAP NO.	3	P.	132
DISTRICT	FIFTH		
SUBD.	DANIEL WHITE FARM		
SECT NO.	-		
BLOCK NO.	-		
LOT NO.	20		
DEED REF.	289/633		
PLAT REF.	10/71		
FLOOD ZONE	'A'		

PERC HOLE LOCATION  
FOR  
THOMAS L. LILLY  
CHARLOTTE K.

JOHN H. PLUMMER and ASSOC. INC.	
615 EASTERN SHORE DRIVE SALISBURY, MD. 21804 (410)-546-4215 FAX (410)-546-0401	
DRAWN BY	JRD
DATE	8/9/4
SCALE	1" = 300'
BOOK 141	PAGE 88

